

---

## Applicability and Permitting in the NO<sub>x</sub> Budget Trading Program

Louisville, KY  
July 25, 2001  
Janice Wagner



---

### Applicability

- ◆ “Core” sources affected by the NO<sub>x</sub> Budget Trading Program include
  - fossil fuel fired electric generators >25 MW
  - industrial boilers and turbines >250 mmBtu/hr
- ◆ Individual small EGUs and non-EGUs may opt in to the trading program



## Applicability (cont.)

---

- ◆ Under the SIP Call, States have the flexibility to
  - add smaller core-type sources (many Northeast states include sources between 15 and 25 MW)
  - not allow individual units to opt in
  - exempt units that limit emissions to <25 tons/season
  - add additional source categories provided they can meet monitoring and reporting requirements (New York includes cement kilns; Illinois allows cement kilns to opt-in)



## Who must have a NO<sub>x</sub> Budget Permit?

---

- ◆ Any source subject to the trading program that is required to have a federally enforceable permit (e.g., Title V permit)
- ◆ Units that opt-in
- ◆ If no federally enforceable permit is required, source is still subject, but no NO<sub>x</sub> budget permit is required (regulation is enforcement mechanism)



## The 25 Ton Exemption

---

- ◆ A unit may apply for an exemption if it:
  - only burns natural gas or oil during the control period
  - limits NO<sub>x</sub> mass emissions to 25 tons or less for the control period
- ◆ If the unit emits more than 25 tons in any year, the exemption is lost and the unit is subject to the program



## NO<sub>x</sub> Budget Permit Application

---

- ◆ For units that commenced operation before 1/1/2000, permit application is due 11/1/2001 for 126 and 11/1/2002 for SIP Call
- ◆ For units that commenced operation after 1/1/2001, permit application is due 11/1/2001 or 18 months after the date the unit commenced operation, whichever is later
- ◆ Permit application is submitted to permitting authority



## Permit Application Contents

---

- ◆ Identification information (plant name, ORIS or facility code)
- ◆ List of all units at the source
- ◆ Standard requirements including holding allowances to cover emissions, monitoring properly under Subpart H, and applying for and receiving a NO<sub>x</sub> Budget permit



## Permit Content

---

- ◆ Permit includes the contents of the permit application
- ◆ Automatically includes
  - all the definitions in the NO<sub>x</sub> Budget Program rule
  - all NO<sub>x</sub> allowance allocations, transfers, and deductions

